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*Attorneys for Plaintiff,
Bionpharma Inc.*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BIONPHARMA INC.,

Plaintiff,

v.

CORERX, INC.,

Defendant.

Civil Action No. 21-10656-JGK

**REPLY DECLARATION OF VENKAT KRISHNAN
IN SUPPORT OF PLAINTIFF BIONPHARMA INC.'S
MOTION FOR PRELIMINARY INJUNCTION**

I, Venkat Krishnan, declare as follow:

1. I am the same Venkat Krishnan who submitted a declaration in support of Bionpharma's motion for a preliminary injunction. I am fully familiar with the facts set forth herein.

2. Bionpharma continued to diligently pursue identification and qualification of one or more new manufacturers for the Product. My prior estimate of 9 months before a new manufacturer can be validated and approved in accordance with FDA regulations, and be on line to supply Product, remains valid. Among the steps required for this process are evaluating the feasibility of the approved process and determine if any changes are required based on the equipment at the new site, developing, optimizing and validating the

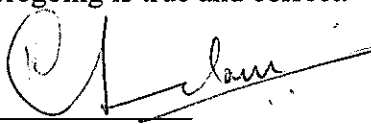
manufacturing and analytical processes based on the procedures and equipment at the new site that are not likely to be identical to those used by CoreRx. The process includes, for example, evaluating the feasibility of all analytical testing methods, identify changes to be made to the methods, validation of all analytical methods used for the raw materials and drug product testing, making small-scale batches to evaluate feasibility, identify changes to be made and optimize the manufacturing process and processing parameters, scaling up to pilot and commercial scale equipment, making a site transfer exhibit batch, perform extensive testing of the site transfer batch, loading the site transfer batch on stability under multiple conditions and in multiple orientations for several months, analyzing the stability samples at periodic intervals to confirm its the product's stability and shelf-life, perform various risk assessments on the product to confirm and demonstrate its continued compliance to FDA's regulations/recommendation, compiling all the results into formal reports, prepare and submit a supplement to the FDA after at least 3 months stability data becomes available, wait for at least 30 days for the FDA to review and confirm if the product from the new site can be commercially distributed, and complete process validation at the commercial scale (which involves manufacturing and extensive testing on at least three commercial batches) prior to launch.

3. Bionpharma will exhaust its inventory of Product before this process is completed, and will then be unable to supply its customers.

4. I participated in a call with Ajay Damani, CEO of CoreRx on Monday, January 3, 2022, to determine if there was a way forward to resolve the parties' impasse over supply of Product. Counsel for both parties were also on the call. We had a cordial and candid discussion, but did not resolve the impasse.

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: January 6, 2021


Venkat Krishnan